



TABLE OF POTENTIAL CONCERNS
US ARMY GARRISON FORT BUCHANAN, PUERTO RICO
EPA MULTIMEDIA INSPECTION, 24-26 APRIL 2012

#	Activity	Building	Media	Description of Findings	Status	Description of Corrective Actions
1	FORT BUCHANAN	Post	SPCC Plan Table 6.1	The Facility has corrected several Corrective Action Plan items. However, there are items which were not amended in the SPCC plan.	Corrected	Comment under the evaluation of the US Army Public Health Command, Spill Plan Reviewer (PE). See attached table 6.1 and evidence of action completed.
2	FORT BUCHANAN	Post	SPCC Plan Table 6.1	The Facility must provide dates of the items corrected & amended according to the SPCC Plan, accordingly.	Corrected	See attached table 6.1 and evidence date signed.
3	FORT BUCHANAN	Post	SPCC Plan	The SPCC Plan does not discuss security requirements for tank valves that permit outflow of oil.	Corrected	Comment to be evaluated by US Army Spill Prevention Office. See attachment.
4	FORT BUCHANAN	689 & 200 Area	SPCC Plan	Oil water separator with evidence of paint. Provide inspector with a scheme which indicates that the water from the Oil water separator is going to the sanitary sewer.	Service Order submitted an approved on 21 May 2012	Although Building 689 was built in 2001 (see attached aerial picture of Fort Buchanan), a service order and quotation was requested (Las Americas Petroleum) in order to perform the tightness test for the tanks at AAFES (B-689) and at DeCA (B-689) AST due to the existing condition. Regarding the two (2) tanks at the 200s Area the manufacturing day is February 1999 (see attached label).
5	FORT BUCHANAN	677	SPCC Plan	SPCC Plan procedure of the valve at B-677 (AAFES Gas Station).	Service order 1064895	AAFES Service Station manager will provide the DPW Environmental Division with an SOP to fulfill said requirement. A service order was place to change the valve due to the valve was jam (possible rusted). The DPW Employee will replace the valve.
6	FORT BUCHANAN	163	SPCC Field Inspection	The drainage valve at tank 163 was broken.	Corrected	The DPW O&M Division replaced the valve.
7	FORT BUCHANAN	200 Area	SPCC Field Inspection	The loading drainage valves at tanks 200A & 200B were broken, and there was no identified secondary containment for piping at these two tanks.	Service Order 1064895	The valve was fixed. Regarding the Secondary Containment, the US Army Public Health Command is reviewing the applicability of the piping requirement since both tanks are secondary contained.
8	FORT BUCHANAN	DPW	SPCC Field Inspection	Provide (via email), a copy of the SPCC Plan, and a determination of total storage amounts.	Corrected	DPW provided EPA with the current version of the SPCC Plan.

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9	FORT BUCHANAN	677	UST	(Recommendation) Move the smart sensor from the premium sump pump to the lowest point on the sump, at this time the sensor is located 4 to 5 inches over the lowest point. (Corrected)	Corrected	AAFES Service Station manager executed the subject action.	 C:\Users\wanda.emmanuel\
10	FORT BUCHANAN	677	UST	(Recommendation) Print and keep one System Status Report for each month with the status of all functions (Normal) in addition of the system test.	Corrected	AAFES Service Station manager executed the subject action.	 C:\Users\wanda.emmanuel\
11	FORT BUCHANAN	381	UST	Move the sump sensor for the Gasoline 1 or 2 inches from bottom. Should be lower.	Corrected	The Directorate of Logistic (DOL) was informed of said findings for proper correction. A local contractor was notified for execution of this action.	
12	FORT BUCHANAN	381	UST	DOL should print a leak detection test on a monthly basis.	Corrected	The DOL Fuel Point manager (Mr. Jose Quiñones) generated the latest report as evidence of equipment function/service.	
13	FORT BUCHANAN	381	UST	Mr. Jose Quiñones shall provide with pump dispenser keys for mechanism area cover and provide pictures of the sump below these pump dispensers to the Environmental Office, to evidence proper functioning of dispenser lines and sump cleanliness.	Corrected	DOL will ordered a new key for future maintenance. However, the service provider already has a key for recurrent maintenance and/or inspection.	
14	FORT BUCHANAN	381	UST	Automatic Gauging Report (.20 Gal/hr test - Pass on a monthly basis because of the high level alarm. Mr. Quiñones shall become in contact with the UST Service Contractor to correct an L4: High Liquid Alarm (L4 sensor at Brine Solution Annular [Intestinal] Space) and reset system.	Corrected	The Directorate of Logistic (DOL) was informed of said findings for proper correction. The Environmental Division along with DOL officials, personel the site to assessed the L4: High Liquid Alarm (L4 sensor at Brine Solution Annular [Intestinal] Space) situation. The Annular Space point was accessed, no evidence of fuel was found and colored brine solution was clear. The probe height was adjusted to optimum level, all caps at fittings were intact and in good condition access cap was resealed and alarm reset. Please see printouts.	
15	FORT BUCHANAN	556	Stormwater	DPW personnel was cleaning with soap an equipment next to the Stormwater drain.	Corrected	The mentioned personnel used the incorrect drainage for proper water waste disposal since there is an existing OWS that service all DPW O&M Shops area nearby the unauthorized storm drain point of discharge.	
16	FORT BUCHANAN	556	Stormwater & RCRA	Oil water separator with evidence of paint. Provide inspector with a scheme which indicates that the water from the Oil water separator is going to the sanitary sewer	Corrected	It is important to highlight that this specific OWS is a full close loop with an underground retention tank that is service regulary on a need to need basis. There is not direct connection to the sewer system. See pictures of the system	

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17	FORT BUCHANAN	521	RCRA	Fluorescent lamps containers are open and not labeled	Corrected	The DPW Environmental labeled said containers and relocated to the accumulation point.
18	FORT BUCHANAN	DPW	RCRA	Who is the Emergency Coordinator (Primary and Alternate)	Corrected	The DPW Environmental Division's Chief is currently the On Scene Coordinator of Fort Buchanan. In addition, the Fort Buchanan's Fire Department is the designated Emergency Response Team as First Responder as per the SPCCP.
19	FORT BUCHANAN	521	RCRA	55 -gallon drums for broken lamps were open and not labeled	Corrected	The DPW Environmental labeled said containers and relocated to the accumulation point.
20	FORT BUCHANAN	DPW	RCRA	Check with 262.34(d) regulation for SQG for the Emergency contact numbers	Corrected	Both the SPCCP and the Hazardous Waste Management Plan include a list of the Fort Buchanan's Emergency Contacts.
21	FORT BUCHANAN	Contracting Area	RCRA	Genett Group Contractor site, evidence of diesel on the Fuel locker	Corrected	The DPW Environmental Division notified the contractor and will provide picture of compliance.
22	FORT BUCHANAN	DPW	AIR	How many employees work at Fort Buchanan?	Corrected	The number of personnel living and/or working at the facility are 2,552 total. The information was provided by the Planning Analysis and Integration Office (PAIO).
23	FORT BUCHANAN	DPW	AIR	Provide record for the ODS machines of more than 50 pounds. Leak rate calculation for the equipment up to 3 years.	Pending	The DPW O&M Division has already provided the Environmental Division with copy of their 2010 and 2011 files for validation and proper submission.